IOWA
Department of
Natural Resources

Environmental Management Systems Pilot Program

EMS Documentation and Records

Kick-off Workshop
November 17-18, 2009

GRESHAM SMITH AND PARTNERS

IOWA
Department of
Natural Resources

Documents

GRESHAM SMITH AND PARTNERS

Document - Definition

- ⊙ Written Instructions on How the EMS Was Developed and How It Will Continue to Be Implemented
- ⊙ Documents May Be Required by Environmental Regulation
- ⊙ Example Documents
  - ▪ Environmental Policy Statement
  - ▪ Communication Procedure
  - ▪ Spill Response Plan
  - ▪ Compliance Manual

Documents

- ⊙ Develop EMS Procedures Needed to Demonstrate Compliance with 10 Elements of the EMS
- ⊙ Key Things to Consider
  - ▪ Identify Who Needs the Document
  - ▪ Identify Places Where Lack of Consistency in Performing a Task Would Lead to an Environmental Problem or Deviation of the EMS
  - ▪ Importance of Remembering How the EMS Element Was Developed and Implemented

Document "Control"

- Document Control is Having a Review and Approval Process for Finalizing Documents
- Document Numbering Systems Can Also Be Part of Document Control
  - Primary Method Used to Ensure a Procedure or Process is Approved
  - Staff is Working From the Latest Document

Examples

ENVIRONMENTAL MANAGEMENT SYSTEM
STANDARD ENVIRONMENTAL OPERATING PROCEDURE
RDD-SEOP 4.4.3

COMMUNICATION

Examples

CPW ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURE

The on-line version and secured hardcopy are the controlled documents. The secured hardcopy will be identified by an "Official Document" stamp giving date of distribution. Any and all other documents are uncontrolled. Contact the EMS Program Manager for revision level status.

Effective Date:	October 1, 2000	Page 1 of 3
Revision: 1	Identification Number: EMS – 4.5.1 (C)	
Title:	Regulatory Compliance Procedure	
Prepared By:	EMS Procedures Subcommittee	
Reviewed By:	EMS Management Steering Committee	
Approved By:	William E. Koopman Jr., General Manager	
	John Cook PE, Assistant General Manager	
Date Approved:	August 25, 2000	

Examples

City of Dallas
Environmental Management System

OBJECTIVES, TARGETS AND ENVIRONMENTAL MANAGEMENT PROGRAMS PROCEDURES

Document Number:	OEQ-EMS-003	Reviewed By:	EMS Core Team
Effective Date:	12/03/2007	Approved By:	Laura Fiffick
Revision Number:	1	Signature:	

Examples

ISO 14001 Reference: 4.5.4 EMS Audit
Location: Central Files EMS: System Procedures
Revision: 00.03.19.02

Created By: EMS PM
Review Schedule: Biennially
March 19, 2002

**SYSTEM PROCEDURE
EMS INTERNAL AUDIT**

Documentation: Many Styles

- Documentation Can be Simple to Very Complicated
  - Text
  - Flow Charts
  - Photographs with Explanations
- EMS Documentation Usually Contains Similar Sections
  - Scope
  - Responsibilities
  - Procedure
  - Training
  - Records

What Makes Sense?

- A Document Format that Works Best for Your Organization
- User-focused
- Communicates the Necessary Information
- Developed by or With Users
- Reviewed and Updated Routinely
- Many Formats are Possible
- Consistency

List of Documentation Requirements

- Environmental Policy
- Impact List (with Significant Impacts)
- Legal Requirements List
- Objectives and Targets List with Action Plans and Key Resources/Additional Needs

Required Procedures

- Communication/Training/Awareness Procedure
- Monitoring and Measurement Procedure
- Assessment Procedure
- Reevaluation and Modification Procedure

Consider the Use of an EMS Manual

- An EMS Manual is Used to Tell "Our EMS Story" and May Also Be Used to Keep all EMS and Compliance Documentation in One Place

- Describes and Defines the Entire EMS Process in One Location and Answers the W questions-- who, where, when, what, why

Records

Record - Definition

- Proof or Evidence that the EMS or Compliance Program is in Place and Functioning
- Most Records Cannot or Should Not Be Changed
- Example Records
  - Completed Training Log
  - Completed Inspection Checklist
  - Manifests

Records – Things to Consider

- Identification of Records
  - What Records Am I Supposed to Keep
- Storage of Records
  - Where Are They Stored
- Retrieval of Records
  - How Can I Access the Records When I Need Them
- Retention of Records
  - How Long Do I Need to Keep Them
- Disposal of Records
  - When Can I Recycled Them

Record Name	Review Frequency	Facility Retention	Storage Location	Final Retention
Manifest		4 years	Environmental files in Building #1	Dallas Municipal Archives and Records Center
Notice of Registration	Annually	4 years	Environmental files in Building #1	Dallas Municipal Archives and Records Center
Audit Records		3 years after Consent Decree	Environmental files in Building #1	
Environmental daily/weekly checklist	Annually	4 years	Filing cabinet in shop store.	
Environmental Training sign in sheets		3 years after Consent Decree	Departmental Training files	Dallas Municipal Archives and Records Center

Records – Things to Consider

◉ *Records That Are Required to Demonstrate Compliance with the Law*

◉ *Most Organizations Have a Records Retention or Retrieval Process Already in Place*

Records Required for the EMS

◉ Record of Objectives and Targets Status

◉ Updated Legal and Other Requirements List

◉ Log of Information Requests from the Public with Corresponding Responses

◉ Records of Metrics Data

◉ Memo of Reevaluation Results with Proposed Modifications

Best Practices

- Ask, "What is the Value in Generating this Document or Record?"
  - Is it Required by Law?
  - Is it Required by the EMS?
  - Would it Eliminate Deviations that Could Cause Environmental Harm
- Determine Whether There is an Existing Document Management/Control/Records Retention Process Already in Place
  - Use it!
-

Best Practices

- Be Clear and Concise
- Consider Paper or Electronic
- Designated Responsibility and Authority for Creating/ Revising Documents
- Retrieval of Old Documents

Over Documentation Problems

- Keeping Up With It!
- If I Say I'm Going to Do It in a Written Procedure, Then I Better Be Doing It
- If the EMS Becomes About Generating Paperwork, Then We Missed the Point

Documentation Deliverables (HF 2570)

- Environmental Policy
- Impacts List
- Objectives and Targets List
- Legal and Other Requirements List
- Communication Procedure
- Monitoring Procedure
- Assessment Procedure
- Record of Reevaluation Results and Proposed Modifications
- Annual Compliance Report

Documents vs. Records Review

Documents

- Offer guidance or explain actions to be carried out
- Policies or direction from Management
- Can be changed

- Example: A blank Audit Checklist form

Records

- Provide verification that things have happened
- Data to demonstrate reaching Targets
- Cannot be changed

- Example: A completed Audit Checklist

Documents vs. Records (cont.)

Documents examples:

- Environmental policy
- Internal standards
- Operating procedures
- Process information
- Organizational charts
- Emergency plans

Records examples:

- Training reports
- Incident reports
- Waste diversion data
- Product information
- Complaints and responses
- Audit findings
- Management review
- Meeting minutes

QUESTIONS?